

## EXHIBIT A

[illegible]



**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA  
BESSEMER DIVISION**

<b>LAWAUNYA WHITE,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO.:</b> _____
	)	
<b>FAMILY DOLLAR STORES, INC.,</b>	)	
<b>a foreign corporation,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S COMPLAINT**

**COMES NOW**, Lawaunya White, the plaintiff, complaining of the defendants, and files this Complaint, by and through her counsel. The Plaintiff avers as follows:

**JURISDICTIONAL BACKGROUND**

1. Plaintiff Lawaunya White is a resident of Jefferson County, Alabama, and is over nineteen years of age.
2. Defendant Family Dollar Stores, Inc. is a Virginia corporation conducting business in Jefferson County, Alabama.

**FACTS**

3. Plaintiff reaffirms and realleges each paragraph above as if more fully set forth herein.
4. On or about the 1<sup>st</sup> day of August 2016, the Plaintiff was shopping at Defendant Family Dollar Stores, Inc. business premises located at 313 36<sup>th</sup> Street, Fairfield, Alabama 35064. Said business is located in Jefferson County, Alabama.
5. The Plaintiff slipped and fell on cleaner and/or detergent that was left on the floor of said business premises.
6. The Plaintiff suffered serious bodily injuries as a result of the fall.

**NEGLIGENCE/WANTONNESS**

7. Plaintiff reaffirms and realleges each paragraph above as if more fully set forth herein.
8. Defendant Family Dollar Stores, Inc. negligently and/or wantonly caused or allowed the cleaner and/or detergent to remain on the floor of its business premises, creating a dangerous condition.
9. Defendant Family Dollar Stores, Inc. negligent and/or wantonly failed to warn the Plaintiff of the dangerous condition.
10. Defendant Family Dollar Stores, Inc. knew or reasonably should have known of the existence of said dangerous condition.
11. As a result of Defendant Family Dollar Stores, Inc.'s negligence and/or wantonness the Plaintiff was caused to suffer damages, including, but not limited to, great pain and suffering, medical expenses, and physical injury.
12. The Plaintiff is entitled to punitive damages pursuant to *Code of Alabama* § 6-11-20.

**WHEREFORE**, Plaintiff demands judgment against the Defendant in an amount to be determined by the court.

Respectfully Submitted,

/s/ Doug Roy  
Doug Roy (ROY006)  
Attorney for Plaintiff  
Lawaunya White

**THE ROY LAW FIRM, LLC**  
2107 5<sup>th</sup> Ave N  
Suite 201  
Birmingham, Alabama 35203  
Phone: (205) 266-5963  
Email: [doug@dougroylaw.com](mailto:doug@dougroylaw.com)

**JURY DEMAND**

Plaintiff hereby demands a trial by struck jury.

**Plaintiffs' Address:**

Lawaunya White  
c/o Doug Roy  
The Roy Law Firm, LLC  
2107 5<sup>th</sup> Ave N  
Suite 201  
Birmingham, Alabama 35203

**PLEASE SERVE DEFENDANT:**

Prentice Hall Corporation Systems  
C/O Family Dollar Stores, Inc.  
57 Adams Steet  
Montgomery, AL 36104



## AlaFile E-Notice

68-CV-2017-900192.00

To: DOUGLAS MCLEAN ROY JR  
dougroyjr@yahoo.com

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O  
68-CV-2017-900192.00

The following complaint was FILED on 3/8/2017 4:09:53 PM

Notice Date: 3/8/2017 4:09:53 PM

KAREN DUNN BURKS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
1851 2ND AVENUE NORTH  
SUITE 130  
BESSEMER, AL, 35020

205-497-8510  
karen.dunnburks@alacourt.gov



## AlaFile E-Notice

68-CV-2017-900192.00

To: FAMILY DOLLAR STORES, INC. C/O  
PRENTICE HALL CORP SYS  
57 ADAMS STREET  
MONTGOMERY, AL, 36104

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O  
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karen.dunnburks@alacourt.gov

State of Alabama Unified Judicial System  Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>68-CV-2017-900192.00</b>
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY  
 LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O

FAMILY DOLLAR STORES, INC. C/O, PRENTICE HALL CORP SYS 57 ADAMS STREET, MONTGOMERY, AL 36104

**NOTICE TO** \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY DOUGLAS MCLEAN ROY JR

WHOSE ADDRESS IS 2027 SECOND AVENUE N # 2B, BIRMINGHAM, AL 35203

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of LAWAUNYA WHITE

pursuant to the Alabama Rules of the Civil Procedure

Date 3/8/2017 4:09:53 PM      /s/ KAREN DUNN BURKS

Clerk/Register

1851 2ND AVENUE NORTH

SUITE 130

BESSEMER, AL 35020

☒ Certified Mail is hereby requested      /s/ DOUGLAS MCLEAN ROY JR

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	_____
		Phone Number of Server _____





ELECTRONICALLY FILED  
4/23/2017 11:22 AM  
68-CV-2017-900192.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
KAREN DUNN BURKS, CLERK

State of Alabama Unified Judicial System  Form C-34 Rev 6/88	<b>SUMMONS</b> - CIVIL -	Case Number <b>68-CV-2</b>
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY  
 LAWANUYA WHITE V. FAMILY DOLLAR STORES, INC. C/O  
 FAMILY DOLLAR STORES, INC. C/O, PRENTICE HALL CORP SYS 57 ADAMS STREET, MONTGOMERY, AL 36104

**NOTICE TO** \_\_\_\_\_

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Date 3/8/2017 4:09:53 PM /s/ KAREN DUNN BURKS  
Clerk/Register  
1851 2ND AVENUE NORTH  
SUITE 130  
BESSEMER, AL 35020

---

☒ Certified Mail is hereby requested /s/ DOUGLAS MCLEAN ROY JR  
Plaintiff's/Attorney's Signature

---

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\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____



ELECTRONICALLY FILED  
3/8/2017 4:09 PM  
68-CV-2017-900192.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
KAREN DUNN BURKS, CLERK

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA  
BESSEMER DIVISION**

<b>LAWAUNYA WHITE,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO.:</b> _____
	)	
<b>FAMILY DOLLAR STORES, INC.,</b>	)	
<b>a foreign corporation,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S COMPLAINT**

**COMES NOW**, Lawaunya White, the plaintiff, complaining of the defendants, and files this Complaint, by and through her counsel. The Plaintiff avers as follows:

**JURISDICTIONAL BACKGROUND**

1. Plaintiff Lawaunya White is a resident of Jefferson County, Alabama, and is over nineteen years of age.
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12. The Plaintiff is entitled to punitive damages pursuant to *Code of Alabama* § 6-11-20.

**WHEREFORE**, Plaintiff demands judgment against the Defendant in an amount to be determined by the court.

Respectfully Submitted,

/s/ Doug Roy  
Doug Roy (ROY006)  
Attorney for Plaintiff  
Lawaunya White

**THE ROY LAW FIRM, LLC**  
2107 5<sup>th</sup> Ave N  
Suite 201  
Birmingham, Alabama 35203  
Phone: (205) 266-5963  
Email: [doug@dougroylaw.com](mailto:doug@dougroylaw.com)

**JURY DEMAND**

Plaintiff hereby demands a trial by struck jury.

**Plaintiffs' Address:**

Lawaunya White  
c/o Doug Roy  
The Roy Law Firm, LLC  
2107 5<sup>th</sup> Ave N  
Suite 201  
Birmingham, Alabama 35203

**PLEASE SERVE DEFENDANT:**

Prentice Hall Corporation Systems  
C/O Family Dollar Stores, Inc.  
57 Adams Steet  
Montgomery, AL 36104

<b>State of Alabama</b> <b>Unified Judicial System</b> <b>Form C-34 Rev. 4/2017</b>	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> <b>68-CV-2017-900192.00</b>
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**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O**

**NOTICE TO:** FAMILY DOLLAR STORES, INC. C/O, CT CORPORATION SYSTEM 2 N JACKSON STREET # 605, MONTGOMERY, AL 36104  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), DOUGLAS MCLEAN ROY JR  
*(Name(s) of Attorney(s))*

WHOSE ADDRESS(ES) IS/ARE: 2027 SECOND AVENUE N # 2B, BIRMINGHAM, AL 35203  
*(Address(es) of Plaintiff(s) or Attorney(s))*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of WHITE LAWAUNYA  
*(Name(s))*  
pursuant to the Alabama Rules of the Civil Procedure.

4/23/2017 11:21:18 AM /s/ KAREN DUNN BURKS By: \_\_\_\_\_  
*(Date)* *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ DOUGLAS MCLEAN ROY JR  
*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
in \_\_\_\_\_ County,  
*(Name of Person Served)* *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

\_\_\_\_\_  
*(Phone Number of Server)*



## AlaFile E-Notice

68-CV-2017-900192.00

To: DOUGLAS MCLEAN ROY JR  
dougroyjr@yahoo.com

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O  
68-CV-2017-900192.00

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Notice Date: 4/23/2017 11:21:18 AM

KAREN DUNN BURKS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
1851 2ND AVENUE NORTH  
SUITE 130  
BESSEMER, AL, 35020

205-497-8510  
karen.dunnburks@alacourt.gov





## AlaFile E-Notice

68-CV-2017-900192.00

To: FAMILY DOLLAR STORES, INC. C/O  
CT CORPORATION SYSTEM  
2 N JACKSON STREET # 605  
MONTGOMERY, AL, 36104

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O  
68-CV-2017-900192.00

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Notice Date: 4/23/2017 11:21:18 AM

KAREN DUNN BURKS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
1851 2ND AVENUE NORTH  
SUITE 130  
BESSEMER, AL, 35020

205-497-8510  
karen.dunnburks@alacourt.gov

# SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CT Corporation Systems  
c/o Family Dollar Stores  
2 North Jackson Street  
# 605  
Montgomery, AL 36104

2. Article Number

(Transfer from service label)

7002 2030 0004 5358 3732

PS Form 3811, February 2004

Domestic Return Receipt

# COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

*Anna Payne*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

*4-20-01*

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No



3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

102595-02-M-1540



UNITED STATES POSTAL SERVICE

AL 360

27 APR '17

PM 2:1

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

FILED IN OFFICE

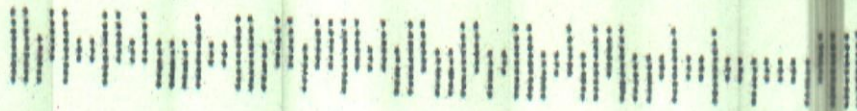
• Sender: Please print your name, address, and ZIP+4 in this box •

MAY 01 2017

CIRCUIT CLERK  
BESSEMER DIVISION  
JEFFERSON COUNTY, ALABAMA

En Dunn Burks, Circuit Clerk  
1 2nd. Avenue North  
Apt 130  
Bessemer, AL 35020

68-CV-2017-900192





## AlaFile E-Notice

68-CV-2017-900192.00

Judge: ANNETTA H. VERIN

To: ROY DOUGLAS MCLEAN JR.  
dougroyjr@yahoo.com

---

## NOTICE OF SERVICE

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LAWAUNYA WHITE V. FAMILY DOLLAR STORES, INC. C/O  
68-CV-2017-900192.00

The following matter was served on 4/26/2017

**D001 FAMILY DOLLAR STORES, INC. C/O**

**Corresponding To**  
CERTIFIED MAIL

KAREN DUNN BURKS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
1851 2ND AVENUE NORTH  
SUITE 130  
BESSEMER, AL, 35020

205-497-8510  
karen.dunnburks@alacourt.gov